

IN DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

UNITED STATES OF AMERICA, ET AL.

PLAINTIFFS,

v.

HOVENSA L.L.C.

DEFENDANT.

CASE NO. 1:11-CV-00006

**PORT HAMILTON'S
MOTION TO CLARIFY THE CONSENT DECREE**

For the reasons set forth in the accompanying Memorandum of Law in support of the Motion to Clarify, the undersigned hereby moves this Court for an order declaring that under the terms of the modified consent decree, Port Hamilton Refining and Transportation, LLLP was and is under no obligation to install additional emission control technology known as a flare gas recovery system.

Respectfully submitted,

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Counsel for Port Hamilton Refining
and Transportation, LLLP

Dated: March 29, 2024

/s/ Andrew C. Simpson

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